



*The Independent Coalition of Franchise Owners is a not-for-profit association representing the interests of The UPS Store franchise owners nationwide.*

August 7, 2012

Postal Regulatory Commission  
901 New York Ave NW, Suite 200  
Washington, DC 20268

Willa Levin  
(0140& 4708)  
President

Reference: PRC Docket Number MC2012-26

John Fuller  
(2529, 3679 & 3746)  
Vice President &  
Mid-Atlantic Region Director

Dear Commissioners,

David Grossman  
(3423 & 3616)  
Secretary &  
Southeast Region Director

The Independent Coalition of Franchise Owners is a not-for-profit professional association representing the interests of owners of The UPS Store franchises nationwide. We are writing to ask that you disallow the United States Post Office's "enhanced" services to Post Office Box customers, specifically:

Bryan Vial  
(2770 & 4990)  
Southwest Region Director

- Acceptance of third-party parcels and other items from UPS, FedEx, DHL and other non-USPS carriers, a practice that has been prohibited for many years.
- The new ability to use the street address of the Post Office where the Post Office Box is located, rather than the conventional "PO Box 123, Anytown, MA 01234."
- The new ability of Post Office Box customers to use the "#123" designation instead of the conventional "PO Box 123" form of address.
- E-mail / text message notification to PO Box customers of items received. ("Real Mail Notification")

Joni Cochran  
(6148)  
Communications Chair

Kevin Hudson  
Executive Director  
Phone +1.386.275.0313  
kevinhudson@theicfo.org

These new business practices place the United States Postal Service in direct and unequal competition with thousands of small businesses across the country. For most store owners like our members, these businesses are privately owned and represent the sole source of our members' income. In many cases, they have financed the purchase of the business with loans secured by their homes. This new form of competition from the USPS will result in significant loss of revenue and damage to their businesses. That will threaten not only their homes and livelihood, but also the jobs of the people they employ.

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As Commercial Mail Receiving Agencies (CMRA), our members' businesses are regulated and inspected by the USPS. There is no other enterprise in our society where one competitor can regulate another, even to the point of requiring them to turn over their customer list on a quarterly basis.

As CMRAs, our members operate under other unfair rules, such as the ability of a postal customer to change his address from a PO Box to another address with a simple "Change of Address" form, while customers of a CMRA are prohibited from doing so. When a CMRA mailbox customer moves, our members are required by the USPS to receive the customer's mail for six months following termination and cannot re-mail it without paying for new postage.

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As noted in PRC Order No. 1366, “the Postal Service has not submitted an appropriate filing that describes the nature and implementing rules for these enhanced services.” The USPS failed to follow the rules in rolling out these new services, and made a unilateral decision and executed it without the necessary filings. What the USPS is doing is fundamentally wrong. A financially viable Post Office is an important part of our members’ business model, but not at their expense. We cannot sit by and watch the USPS launch a series of products and services specifically designed to take our members' customers. A relationship with the USPS is a careful balance of competition and support, and in this instance they have tipped the scales.

Thank you for your time and kind attention to this matter. Please do not hesitate to contact me if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin H. Hudson", with a stylized flourish at the end.

Kevin H. Hudson  
Executive Director  
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